

From: rootiekazootie

To: 1-919-541-0947

Oct 24, 2001 12:15AM P 1/2

Intnat'l Workshop on In Vitro Methods.....

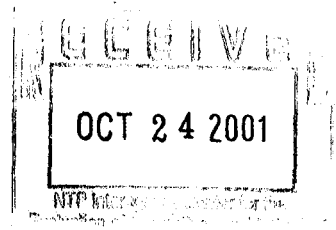
Dr. William S. Stokes

Director, NICEATM (MD EC-17)

National Institute of Environmental Health Sciences

P.O. Box 12233

Research Triangle Park, NC 27709



Dr. Stokes:

Please register my comments Re: Report of the
International Workshop on In Vitro Methods for
Assessing Acute Systemic Toxicity as follows:

1. NIEHS should adopt the new non-animal test methods
IMMEDIATELY. The non-animal test methods have been
considered for almost 20 years, and animals should not
continue to suffer and die because of bureaucratic
inertia.
2. NIEHS recommends using the non-animal method to set the starting dose for
further animal- poisoning tests.
While this may reduce the number of animals killed in
acute poisoning studies, it does not go far enough.
Government agencies should use in vitro cell culture
tests to COMPLETELY REPLACE the use of animals in
lethal dose tests.
3. At a minimum, ALL government agencies that
currently require the acute animal-poisoning studies
should IMMEDIATELY incorporate the in vitro cell
culture method as a transitional means of reducing the
number of animals killed and should fully support the
use of this method as an eventual REPLACEMENT for
lethal-dose poisoning studies. In particular, the EPA
must immediately incorporate the non-animal cell
culture method into its HPV chemical program, as
promised in its October 1999 agreement with the animal
protection community.

Thank you for the opportunity to submit my comments on the use of non-animal (in
vitro cell culture) methods
to study the toxic effects of chemicals from acute
exposure, and for your consideration of this very

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important matter.

Sincerely,

Ruth Herrick

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